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and Luis Sencion-Gonzalez*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDWARD LONDON,

Plaintiff,

v.

CHARLES DANIELS, et al.,

Defendants

Case No. 3:20-cv-00284-MMD-CLB

**MOTION FOR EXTENSION OF
TIME TO FILE A MOTION FOR
SUMMARY JUDGMENT
[FIRST REQUEST]**

Defendants Skyler Sheeks and Luis Sencion-Gonzalez (collectively, NDOC Employees), by and through counsel Aaron D. Ford, Attorney General for the State of Nevada, and Laura M. Ginn, Deputy Attorney General, hereby move this Court for an extension of time file a Motion for Summary Judgment. This Motion is made and based upon Federal Rule of Civil Procedure 6(b)(1)(A), the attached Points and Authorities, the papers, and pleadings on file herein, and such other and further information as this Court may deem appropriate.

MEMORANDUM OF POINTS AND AUTHORITIES

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to “achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) Such power is indispensable to the court’s ability to enforce its orders, manage its docket, and regulate insubordinate conduct. *Id.* (See also *Mazzeo v. Gibbons*, No. 2:08–cv–01387–RLH–PAL, 2010 WL 3910072, at *2 (D.Nev.2010)).

1 LR IA 6-1 discusses requests for continuances. The rule states:

2 (a) A motion or stipulation to extend time must state the reasons
3 for the extension requested and must inform the court of all
4 previous extensions of the subject deadline the court granted.
5 (Examples: "This is the first stipulation for extension of time to
6 file motions." "This is the third motion to extend time to take
7 discovery.")

8 This is the first request, filed timely, and is requested for good cause. The parties
9 engaged in a meet and confer on April 14, 2022 to discuss Defendant Sheeks' Requests for
10 Admission and Interrogatories propounded on London. London was given an extension to
11 complete the Requests for Admission and Interrogatories on or before April 19, 2022.
12 NDOC Employees filed a Motion to Compel (ECF No. 26) requesting this Court to order
13 London to respond to the Interrogatories and deem the Requests for Admission admitted.
14 London has not responded to NDOC Employees Motion to Compel yet. NDOC Employees
15 respectfully request an extension to allow this Court to rule on the Motion to Compel and
16 London to respond.

17 NDOC Employees provide the following information in accordance with Local Rule
18 26-3. London failed to respond to Defendant Sheeks' Interrogatories and failed to respond
19 to the Requests for Admission. Discovery closed on April 4, 2022.

20 The proposed deadlines are:

21 Dispositive motion deadline: July 7, 2022

22 Joint pretrial order (if no dispositive motions filed): August 8, 2022¹

23 Counsel submits that the recent Motion to Compel and outstanding discovery in this
24 case constitutes good cause for granting this extension of time to file a Motion for Summary
25 Judgment.

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¹ The date was adjusted to a weekday.

1 Therefore, Defendants request this Court to extend the deadline from **May 4, 2022**,
2 to **July 7, 2022**, to file a Motion for Summary Judgment.

3 DATED this 27th day of April, 2022.

4 AARON D. FORD
5 Attorney General

6 By: /s/ Laura M. Ginn
7 LAURA M. GINN (Bar No. 8085)
8 Deputy Attorney General

9 *Attorneys for Defendant*

10 IT IS SO ORDERED.

11 Dated: April 27, 2022

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14 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 27, 2022, I electronically filed the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE A MOTION FOR SUMMARY JUDGMENT [FIRST REQUEST]**, via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Edward London, #1170368
Southern Desert Correctional Center
P.O. Box 208
Indian Springs, NV 89070

/s/ Karen Easton
An employee of the
Office of the Nevada Attorney General